

WA 6906

10-24-85

3c

Facility Management Plan
Ridgefield Brick and Tile
Ridgefield, Washington
WAD009036906



Background

The Ridgefield Brick and Tile land disposal site was discovered by EPA personnel during an inspection of Pacific Wood Treating Corporation in 1983. PWT had been disposing of its deck clean-up and wood waste and ash from sludge incineration (K001 and D004) in this clay quarry but had not described these off-site disposal activities in PWT's Part A application. PWT submitted a late notification for the RBT site. RBT was originally owned by Mr. Elmer Muffett while being operated by PWT, but the site now has been purchased in full by PWT.

Listed waste was received at the RBT land disposal facility until January 25, 1983. Because RBT did not receive waste after January 26, 1983, it was not initially regulated under the permitting regulations of 40 CFR Parts 264 and 270. When the Hazardous and Solid Waste Amendments of 1984 were issued, the date on which a facility could have last received waste and not be subject to RCRA permit requirements was changed to July 26, 1982. A permit for the RBT facility therefore is now required. Minimum requirements covering the permitted closure of RBT include closure, post-closure and financial assurance, as specified at 40 CFR Parts 264 and 270.

Specific background dates include the following:

4/21/83 NOV issued by EPA to Ridgefield Brick and Tile Company for failure of this disposal facility to submit a Notification and a Part A permit application.

5/19/83 Part A application submitted to EPA.

6/20/83 WDOE Notice of Penalty (No. DE 83-284) for operating an unpermitted dangerous waste management facility since 1978.

6/10/83 Receipt of RBT preliminary ground water investigation showing presence of chromium and pentachlorophenol.

7/5/83 PWT letter to WDOE and EPA stating that it did not intend in the future to utilize the RBT site for waste disposal.

7/11/83 WDOE letter granting a one-week extension to PWT for completion of the ground-water monitoring plan and closure plan for the RBT site. Also stated by WDOE was that there are no regulations which require public participation for the closure of the RBT site.

7/19/83 Letter from PWT to WDOE regarding WDOE Notice of Penalty (No. DE 83-284). Included were copies of the draft closure plan and draft post-closure plan for the RBT site, including plans for ground-water monitoring.

7/27/84 Copy RBT Certification of Closure to EPA from PWT.

8/1/83 Battelle contractor's comments on closure plan received.

8/5/83 WDOE comments to PWT on deficiencies in the RBT draft closure/post-closure plan and ground-water monitoring plans.

8/10/83 EPA letter to WDOE commenting on deficiencies in the RBT draft closure plan.

8/25/83 Addendum to RBT draft closure plan received by EPA.

10/26/83 RBT "closed" under WDOE Order No. DE 83-468 to PWT, by virtue of WDOE's approval of the the closure plan. Approval was qualified by certain conditions which require(d) future analyses of soil borings, leachate samples, and domestic-well

samples. No dates were given for the submittal of the results of the required analyses.

6/12/84 CME at RBT by EPA (M. Brown). Monitoring well system was found to be inadequate. Leachate drainage from the site was reported to be uncontrolled during the winter. Conclusions were corroborated by J. Sceva.

1/9/85 Report from Sweet-Edwards to PWT regarding the chemical and statistical analyses of RBT water quality data collected and analyzed quarterly for one year. It reports that no significant increase of downgradient water quality parameters over background values exists.

4/8/85 WDOE call-in of RBT's Part B application.

4/11/85 EPA call-in of RBT's Part B and 3007 request for information regarding past and continuing releases from the regulated unit.

- 4/30/85 Compliance inspection conducted by EPA (Bob Stamnes), in conjunction with the Part B call-in meeting.
- 9/9/85 Letter received by EPA from PWT regarding the Part B call-in for RBT. Letter states that the Part B will not be submitted, due in part to the alleged fact that RBT has already been closed under the supervision and approval of EPA and WDOE.
- 9/30/85 3008 Complaint and Compliance Order from EPA covering interim status ground-water monitoring, financial, closure and post-closure requirements. Closure of the RBT facility under interim status has not been recognized by EPA due to the lack of public notice of the closure plan.
- 10/11/85 Due date for RBT's Part B application and submittal of information on past and/or ongoing releases.

Significant Factors

The potential for ground-water contamination is not quantifiable, due to an inadequate ground-water monitoring network and to an unknown source strength and composition comprising the hazardous waste unit. Although there is no indication that other disposals included hazardous waste, PWT was reportedly not the sole disposer at this facility.

RBT is dependent upon four local domestic wells and three lysimeters

to meet interim status ground water monitoring requirements. Little is known about well installation details or screening depths. Their distances from the regulated unit are excessive to meet requirements for immediate detection of contaminants. Water samples are collected after passing through pneumatic tanks and filters. Standard RCRA parameters have not been analyzed. One early sampling event indicated levels of chromium (0.08 and .010 ppm) exceeding the drinking water standard (0.05 ppm) in two wells, one of which was the designated upgradient well. These values have not been substantiated in subsequent sampling events.

Schedule

10/25/85 Copy of 9/30/84 3008 Order sent to PWT, as original submittal was not sent Certified Mail.

12/01/85 Settlement conference, if PWT responds to 3008 Order. Otherwise, a second 3008 Order will be issued, for failure to submit the required Part B application and respond to the 3007 request for information regarding environmental releases; and for failure to respond to the 3008 Order issued 9/30/85.

cc:C.Rice

G.Hofer

R.Stammes

M.Bailey

WMB:M.bailey:MLB:10/24/85:4508G

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